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November 20, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

**Re:** Notice of Ex Parte In the Matter of Video Description: Implementation of the Twenty-First Century Communication and Video Accessibility Act of 2010, MB Docket No. 11-43; In the Matter of Connect America Fund, WC Docket No. 10-90

## Dear Ms. Dortch:

On Monday, November 18, 2013, Dave Rozzelle, Executive Vice President, Craig Rosenthal, Vice President and General Counsel, and Mike Zarrilli, Vice President, Government Relations and Senior Counsel of Suddenlink Communications, along with Jason Rosenstock and Rachel Sanford of ML Strategies, met with Commissioner Ajit Pai and Matthew Berry; Commissioner Mike O'Rielly and Ann Bender; Maria Kirby, Media Advisor to Chairman Wheeler; and Holly Saurer, Media Advisor to Commissioner Rosenworcel for a general discussion about the company and to discuss the Connect America Fund and the Implementation of the Twenty-First Century Communication and Video Accessibility Act of 2010.

Suddenlink offered general background information about the company, including the services they provide and the types of markets they serve. Mr. Rozzelle also explained that the company is not vertically integrated and they have made significant investment in building out fiber networks in recent years.

Suddenlink discussed how the video description "talking guide" requirements under the Implementation of the Twenty-First Century Communication and Video Accessibility Act of 2010 may impact the company. Mr. Rozzelle and Mr. Rosenthal noted that Suddenlink does not internally develop any of the software used in their system, including any video description software, thus they will be obligated to rely on the efforts of third party vendors to comply with this rule.

Mr. Zarrilli also discussed the Connect America Fund, specifically Phase 1 Part 2, and how census block funding objections are being dealt with in this proceeding. At issue are situations where Suddenlink has filed census block objections because they provide services and actively

market to homes in the census block, however, these homes have refrained from adopting broadband services. Suddenlink noted that although broadband adoption may be low in some of these areas, the company does have video subscribers and does make broadband service available, and therefore the census blocks should be considered served under the standards set forth by the Connect America Fund.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the attendees.

Sincerely,

Rachel Sanford

Cc: Ajit Pai, Matthew Berry, Holly Saurer, Maria Kirby, Mike O'Rielly, Ann Bender